



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

164 2041
Inspection Date 8-3-07
Time Start 9:30
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company name Rescar Inc I.D. Number PA0086681392
Site Address 450 Osborn St
County Cleanfield Municipality DuBois/Bundy Zip 15801
Name of Inspector James D. Greene / Jason Yuter
Name & Title of Responsible Official Tim Schaffer Plant manager
Person Interviewed Jerry Federico Telephone () _____
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: 6000 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity Handler

Universal Waste Types Florescent Lamps

3. Hazardous Waste Transporters:

Transporter Name Emerald Environmental License Number PA-AH 0641

Transporter Name American Environmental License Number PA-AH 0671

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001 D035	Methanol, waste flammable Liquid	American Environmental Morgantown WV
D002	Sulfuric Acid	
D035 F003 F005	waste flammable Solids	
D002	waste ferrous chloride Sol.	
D002, D003	waste Sodium hydrosulfide	
D001, D037	waste toxic liquid, Sodium Bichromate	
D002	Waste Ammonium thiosulfate	
D002	waste Corrosive Liquid, Sodium hydroxide	

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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Rescar ID Number _____ Date 8-3-07

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
✓				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
✓				Identification Number	262a.10	262.12	H002
✓				Authorized transporters only	262a.10	262.12(c)	H003
✓				Subsequent notification requirements met	262a.12(b)		H004
		✓		Proper manifest used	262a.10	262.21	H005
		✓		Manifests filled out correctly and completely	262a.20		H006
		✓		Manifests signed and routed properly	262a.23(a)	262.23	H007
		X		Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	✓			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	✓			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
	✓			Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
		X		Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
CP	✓			Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
✓				Specified records retained for three years	262a.10	262.40(c)	H014
	✓			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
✓				Exception reporting procedures followed	262a.42	262.42	H016
✓				Spill reporting procedures followed	262a.10	262.34(d)	H017
	✓			PPC plan developed and implemented	262a.10	262.34(a)	H018
HP	✓			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
		✓		Source reduction strategy prepared and available (LQG only)	262a.100		H020
				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Res car ID Number _____ Date 8-3-1

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
✓				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
✓				Containers of hazardous waste in good condition	265a.1	265.171	H026
✓				Containers and stored waste compatible	265a.1	265.172	H027
✓				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
✓				Containers managed to prevent leaks	265a.1	265.173(b)	H029
✓				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
✓				Container storage areas inspected at least weekly	265a.1	265.174	H031
✓				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
		X		Proper containment and collection systems in place	265a.179		H033
✓				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
✓				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
✓				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
✓				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)	265.175	H037
Db		X		Secondary Containment of HAZ Waste Storage Area	265a.179	265.175 264.175	H038

rescan
8-3-7

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation
1	2	3	4			40 CFR Part 26
				Generators		
✓				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
	✓			Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
	✓			Dilution not used as a substitute for treatment.		3
✓				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)
				Storage Facilities		
				Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Co 265.13(c)
				Containers marked to identify contents and accumulation date.		50(a)(2)
				Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
				Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
				Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
				Treatment Facilities, including PBR and RRR Facilities		
				Dilution not used as a substitute for treatment.		3
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
				Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
				Land Disposal Facilities		
				Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
				Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
				Facility retains copies of generator notifications and certifications.		7(c)(1)

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INSPECTION REPORT COMMENTS

Date of Inspection 8-3- Identification Number PADO 86681392

Company/Facility/Site Name Rescar

I was accompanied on this inspection by Jason Gufer, Solid Waste Trainer.

Rescar cleans and refurbishes rail road cars and tankers.

While walking through the railroad yard we come upon a waste storage area that had 13 hazardous waste drums and 22 residual waste drums. 11 of the hazardous drums containing sulfuric acid were generated 8-1-07. 1 drum of methanol accumulation of 6-6-07 and 1 drum of ethyl alcohol accumulation of 7-23-07.

4033 There was no secondary containment around this drum storage area. The approved drum storage on the other end of the property does have secondary containment along with a roof. During the inspection the drums were transported to the approved storage area.

HO08 During the inspection of the "approved" storage area we found 4 drums past 90 day storage. 2 drums containing dibutylamine dated 4-18-07 2 drums containing Synergel w/ accumulation dates 4-9-07 and 4-10-07.

The above inspection only centered around container storage and training.

HO12 The training records indicated that the 2 employees

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the persons interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed *Gerardo Decia* Date 8/3/07
(Signature)

Inspector *James D. Guene* Date 8-3-07
(Signature)

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INSPECTION REPORT COMMENTS

Date of Inspection 8-3-7Identification Number PAD 086681392Company/Facility/Site Name Rescar

that were ^{working} in the ~~illegally~~ QD 6 non-approved storage area; Adam Nixon and Craig Romanic last had HAZ Waste Mgmt training on 12-23-05. ^{Per Corp. Guidance}

Note: While we were at the ~~low~~ waste approved storage area Craig Romanic was transporting the drums from the non-approved storage area to the approved storage area and one of the drums ~~carried~~ QD 6 carrying sulfuric acid fell off the pallet onto the ground. Mr. Romanic was using a fork lift. The drums contents did not exit the drum.

I spoke to Adam Nixon about securing the drums being transported by the fork lift and he said that they had been trained or told to strap the drums to the fork lift.

We did not inspect or review any other paper ~~work~~ QD 6 work other than weekly inspections and training records. The person that takes care of all the paper work was not on-site.

* All those areas marked "Not Determined" ^{we} did not reviewed.

In addition the last shipment of waste by Emerald was the 28th of July

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Person interviewed (signature) James D. SedewDate 8/3/07Inspector (signature) James D. MooreDate 8-3-7

6066

EPA ID Number				Handler Name			
PAD086681392				Rescar Inc			
VIOLATIONS SECTION							
(Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form)							
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete						Link to Above Evaluation <input checked="" type="checkbox"/>	
Seq. No	Violation Type Code	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier		Actual RTC Date (mm/dd/yyyy)	
	262.C	S	08/03/07	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.			
Notes:							
LINK CITATIONS TO ABOVE VIOLATION?				YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in information below	
Citation Type		Citation		Citation Type		Citation	
F		262.34(a)					
F		262.34(a)(4)					
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete						Link to Above Evaluation <input checked="" type="checkbox"/>	
Seq. No	Violation Type Code	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier		Actual RTC Date (mm/dd/yyyy)	
	XXS	S	8/3/07	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.			
Notes:							
LINK CITATIONS TO ABOVE VIOLATION?				YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in information below	
Citation Type		Citation		Citation Type		Citation	
S		265a.179					
HANDLER SECTION (Fill out if RCRA Non-Notifier)							
Handler Name				Contact			
Street							
City		State		Zip Code			
County							
UNIVERSE CHANGE SECTION (Fill out if Universe Change Required)							
i. Indicate the Facility's current Universe(s):							
ii. Indicate the new RCRAInfo Generator Universe: Note: All TSD activity changes must be handled by the IOR and cannot be made using this form.				LQG <input type="checkbox"/> SQG <input type="checkbox"/> CEG <input type="checkbox"/> Non-Handler <input type="checkbox"/> Closed <input type="checkbox"/>			
iii. Indicate the new transporter status: (Only fill out if the facility requires a transporter status change)		Transporter <input type="checkbox"/> If the transporter box is checked, you must check at least one mode of transportation below: <input type="checkbox"/> Air <input type="checkbox"/> Water <input type="checkbox"/> Rail <input type="checkbox"/> Other <input type="checkbox"/> Highway			Non-Transporter <input type="checkbox"/> Check non-transporter if the facility is currently listed in RCRAInfo as a transporter AND no longer transports hazardous waste.		

*Required Fields

RCRAInfo CM&E EVALUATION – VIOLATION FORM

[illegible]

***Required Fields**